

REMARKS

In the March 8, 2005 Office Action, the Examiner noted that claims 1-12 were pending in the application; and rejected claims 1, 2, 11 and 12 under 35 USC § 102(e) as anticipated by U.S. Patent 6,148,312 to Paik et al. (Reference A). Claims 1-12 remain in the case. The Examiner's rejections are traversed below.

Rejections under 35 USC § 102(e)

On pages 2 and 3 of the Office Action, the Examiner rejected claims 1, 2, 11 and 12 under 35 USC § 102(e) as anticipated by Paik et al. In addition, on pages 3 and 4, the Examiner included "Remarks" responding to the arguments in the November 2, 2004 Amendment. These remarks are summarized by the statements that "the system creates an aggregated data set, which is the complete set of data created by cycling through steps (404-406) ... [and that since] step (408) does not occur until after the aggregation is complete the inconsistency detection must be acting upon the aggregated data set" (page 4, lines 6-8, emphasis in original).

Thus, it is understood that in the view of the Examiner, the operation indicated in step 402 (Examined Contents of Existing Articles and Metadata) involves aggregation. However, the Applicants understand step 402 as an operation that is performed **after** metadata and articles have been collected in some fashion. As stated in Paik et al., the embodiment illustrated in Fig. 4 "examines the contents of existing articles and corresponding metadata residing within an electronic document system and/or database" (column 10, lines near "55"). Step 404 is described as a determination of "whether any metadata exists for the **examined** articles" (column 10, line near "60", emphasis added). No explanation has been found in Paik et al. regarding the difference between "contents of existing articles and corresponding metadata" and "examined articles." In other words, it is unclear whether all of the database is being examined or only a selected portion of it is being examined in step 402.

The response to the arguments in the November 2, 2004 Amendment primarily emphasized that Paik et al. allegedly discloses aggregating data and, secondarily, "inconsistency detection." The Examiner has seemingly ignored the primary emphasis in the Remarks of the November 2, 2004 Amendment "that the 'aggregated data set' (claim 1, line 8) is formed of extracted fact data, not a combination of extracted fact data and text as taught by Paik et al." (see, November 2, 2004 Amendment, page 7, lines 4-6). The failure to address this difference is apparent in the next-to-last paragraph on page 2 of the Office Action, stating that the "complete

resulting set of information, including all metadata, corrected articles and non-corrected articles form an aggregated data set."

Claim 1 has been amended to recite "data aggregation throughout the extracted fact data" (claim 1, line 5) to more clearly describe what is being searched. As discussed in the November 2, 2004 Amendment, Paik et al. does not disclose "extracting from a text, fact data stipulated by a combination of a target object, an attribute name, and an attribute value" (claim 1, lines 2-3) and then "performing a data aggregation" (claim 1, lines 4-5) on the extracted data that results. Therefore, it is submitted that claim 1 patentably distinguishes over Paik et al. for the reasons discussed in the November 2, 2004 Amendment.

As discussed in the November 2, 2004 Amendment, in claim 2 the data aggregating unit puts "fact data ... into at least one data set" (claim 2, lines 5-6). Claim 2 since it was originally filed has recited that the inconsistency detecting unit operates on "a data set aggregated by said data aggregating unit" (claim 2, line 8). It is submitted that the term "data set" as used in claim 2 and the specification is inconsistent with an interpretation that includes "articles" as part of the data set. It should be clear from the language used in claim 2, as interpreted in light of the specification, that the inconsistency detecting unit, correctness/incorrectness determining unit and final data integrating unit operate on fact data extracted from a text by the data extracting unit and aggregated by the data aggregating unit, instead of comparing metadata with text from which it was extracted, as taught by Paik et al.

Furthermore, on page 3, lines 5-6 of the Office Action, it was asserted that decision block 408 which determines whether "Articles Exist for Found Metadata" and the oval labeled "Return" correspond to the inconsistency detecting unit and the correctness/incorrectness determining unit, respectively, recited in claim 2. However, the inconsistency detecting unit is recited as "detecting an inconsistent data group" (claim 2, line 7) and the correctness/incorrectness determining unit is recited as "determining which data is correct within the inconsistent data group" (claim 2, lines 9-10). There are multiple differences between these operations and the cited portions of the flowchart in Fig. 4 of Paik et al. which allegedly anticipate these limitations. First, claim 2 recites two separate operations, detecting inconsistency and determining correctness of data, while Fig. 4 of Paik et al. indicates only determining whether there is a match between articles and metadata. It is not inherent in making such a match to detect inconsistency and determine correctness of data as recited in claim 2. Furthermore, it is the correctness of data "within the inconsistent data group" (claim 2, lines 9-10) that is determined by the correctness/incorrectness determining unit. Certainly, a "Return" operation does not perform such a determination and there is no suggestion in Fig. 4 or anywhere else in Paik et al. of any accuracy

determination of a data group that is first detected to be inconsistent. All that is taught by Fig. 4 of Paik et al. is creating metadata if lacking for articles and discarding metadata for which no corresponding article exists. For at least the reasons set forth above, it is submitted that claim 2 patentably distinguishes over Paik et al.

Using language similar to that in claim 1, claim 11 recites "aggregating the extracted fact data throughout the text into at least one aggregated data set" (claim 11, lines 7-8). As discussed above, it is not clear that Paik et al. discloses this operation. Furthermore, claim 11 recites "detecting an inconsistent data group which cannot be consistent by scanning the at least one aggregated data set" (claim 11, lines 9-10) and then "determining which data is correct within the inconsistent data group" (claim 11, line 11). As discussed above with respect to claim 2, this combination of operations is not taught or suggested by Paik et al. Therefore, it is submitted that claim 11 patentably distinguishes over Paik et al. for many of the reasons discussed above with respect to claims 1 and 2.

As noted in the November 2, 2004 Amendment, Paik et al. does not teach or suggest most of the operations recited in claim 12, including "detecting an inconsistent data group by scanning only the grouped fact data" (claim 12, line 6). As discussed above with respect to claim 2, no suggestion has been cited or found in Paik et al. that any sort of scanning operation is performed on "grouped fact data" as recited in claim 12. Fig. 4 of Paik et al. indicates identification of two groups, articles without metadata and metadata without articles. The operation performed for the first group is creation of metadata and the operation performed on the second group is deleting. Clearly deletion of data does not involve either detection of inconsistency or scanning of data and it is submitted that even if creation of metadata involves scanning, it is not inherent that it also involves detecting inconsistency. Therefore, it is submitted that claim 12 patentably distinguishes over Paik et al.

Request for Examiner Interview

If all of the rejections of claims 1, 2, 11 and 12 are not withdrawn, the Examiner is respectfully requested to contact the undersigned **prior to issuing another Office Action** to arrange an Examiner Interview to discuss what further amendments are necessary to avoid misinterpretation of the claims.

Objection to Claims 3-10

In the fourth paragraph on page 3 of the Office Action, the Examiner objected to claims 3-10 as dependent upon a rejected base claim, but allowable if rewritten in independent form.

Claims 3 and 8-10 have been amended to form independent claims by incorporating the limitations of claim 2 and claims 4-7 depend from claim 3. Therefore, it is submitted that at least claims 3-10 are in condition for allowance.

Summary

It is submitted that Paik et al. does not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 1-12 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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7/8/05

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